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[Attorneys for clients as listed on signature page0])

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)

(Jointly Administered)

**NOTICE OF EXHIBITS TO BE PRESENTED
AT THE CONFIRMATION HEARING IN
SUPPORT OF CERTAIN FIRE VICTIM
CLAIMANTS' OBJECTION TO PLAN
SUPPLEMENT IN CONNECTION WITH
DEBTORS' AND SHAREHOLDER
PROPOSERS' JOINT CHAPTER 11 PLAN
OF REORGANIZATION DATED MARCH 16,
2020**

Date: May 27, 2020

Time: 10:00 a.m.:

Place: Courtroom 17, 450 Golden Gate Ave.,
16th Floor, San Francisco, CA

1 **NOTICE IS HEREBY GIVEN** that the following exhibits will be presented by Certain
2 Fire Victim Claimants/Creditors GER Hospitality, LLC, Adolfo Veronese Family, William
3 O'Brien, Ming O'Brien, Fuguan O'Brien; Michael Heinstein, Kye Heinstein, Karen Roberds;
4 Anita Freeman; William N. Steel, Clinton Reilly; Ken Born, Christine Born, Cathy Ference,
5 William Ference, Allen Goldberg, Robert Johnson, Patricia Goodberg, Paul Goodberg, Terence
6 Redmond, Melissa Redmond, Sonoma Court Shops, Inc., and Rita Godward, at the Confirmation
7 Hearing of the above Debtors on May 27, 2020 at 10 a.m. in support of Certain Fire Victim
8 Claimants/Creditors Objection to Plan Supplement in Connection with Debtors' and Shareholder
9 Proponents' Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 filed herein (Dkt.
10 7316):

11 1. Documents which reflect that before the Official Committee of Tort Claimants
12 (TCC) and PG&E entered into a Restructuring Support Agreement ("RSA"), Elliott Management
13 Corporation ("Elliott") offered \$13.5 billion, all cash, to Fire Victims, including the Tubbs
14 claims, plus an additional \$150 million for the Ghost Ship fire victims, including but not limited
15 to a letter from Elliott to Gov. Gavin Newsom.

16 2. Restructuring Support Agreement [DKT 3992-1] to Debtors' Motion Pursuant to
17 11 U.S.C. sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order
18 (I) Authorizing the Debtors to Enter into Restructuring Support Agreement with the Consenting
19 Subrogation Claimholders, (II) Approving the Terms of Settlement with Such Consenting
20 Subrogation Claimholders, Including the Allowed Subrogation Amount, and (III) Granting
21 Related Relief, filed 09/24/2019 [DKT 3992]

22 3. Restructuring Support Agreement (RSA) re Fire Victim Claimants dated
23 December 4, 2019; and Draft Summary of Terms Relevant to Treatment of Non-Subrogation
24 Wildfire Claims dated December 4, 2019.

25 4. Restructuring Support Agreement (RSA) re Fire Victim Claimants dated
26 December 6, 2019; and Summary of Terms Relevant to Treatment of Non-Subrogation Wildfire
27 Claims dated December 6, 2019.

1 5. Restructuring Support Agreement dated December 6, 2019, between the TCC,
2 certain Consenting Fire Claimant Professionals, Shareholder Proponents, and the Debtors [Bankr.
3 Dkt. 5038-1] (the “Tort Claimant RSA”)(Exhibit A to the “Tort Claimant RSA Motion”, Dkt.
4 5038]

5 6. The Restructuring Support Agreement dated on or about September 24, 2019,
6 between certain Consenting Creditors and the Debtors (the “Subrogation Claimant RSA”) filed by
7 Debtors on 9/24/2019. [Bankr. Dkt. 3992-1] .

8 7. Notice of Fourth Amendment to Amended and Restated Restructuring Support
9 Agreement with Subrogation Claimants, filed by Debtors on 12/10/2019 [DKT 5063].

10 8. The agreement between the Debtors and counsel for the *Tubbs Fire* preference
11 cases, in which the *Tubbs Fire* preference cases would be settled for an undisclosed amount,
12 which would become liquidated claims and paid in cash from the Fire Victims’ Trust Fund.

13 9. Letter dated December 13, 2019 from Gov. Gavin Newsom to PG&E Corporation
14 regarding Draft Amended Plan of Reorganization for PG&E Corporation and Pacific Gas and
15 Electric Company.

16 10. Tort Claimants RSA Amendment [DKT 5143.1] to Debtor’s Notice of Filing of
17 Amendment to Tort Claimants Restructuring Support Agreement (RSA), filed on 12-16-2019)
18 [DKT 5143].

19 11. Fire Victim Trust Agreement and Claims Resolution Procedures[DKT 7037]
20 exhibited to Debtors’ Notice Regarding Filing of Plan Supplement in Connection with Debtors'
21 and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March 16, 2020,
22 filed 05/01/2020 [DKT 7037

23 12. Restructuring Support Agreement (RSA) between Debtors and the Ad Hoc
24 Committee of Senior Unsecured Noteholders, and amendment(s) thereto.

25 13. *Napa Cal Fire Merged Report*, including parcel numbers, prepared September 17,
26 2019 by Michael Kasoulas.

27 14. *Nuns Fire-Napa Sonoma with Structure, Square Footage and Lot Size*, including
28 parcel numbers, prepared July 2019.

1 15. *Cal Fire-Butte, with Square Footage, Lot Size*, including parcel numbers, dated
2 July 1, 2019.

3 16. Objection of the Official Committee of Tort Claimants to Confirmation of Debtors
4 and Shareholder Proponents Joint Chapter 11 Plan of Reorganization Dated March 16, 2020
5 [DKT 7306]

6 17. Declaration of David J. Richardson in Support of Objection of the Official
7 Committee of Tort Claimants to Confirmation of Debtors and Shareholder Proponents Joint
8 Chapter 11 Plan of Reorganization Dated March 16, 2020 (RE: related document(s)7306
9 Objection to Confirmation of the Plan), and Exhibits A-U thereto, filed 05/15/2020U [DKT 7307]

10 18. Declaration of Jerry R. Bloom in Support of Objection of the Official Committee
11 of Tort Claimants to Confirmation of Debtors and Shareholder Proponents Joint Chapter 11 Plan
12 of Reorganization Dated March 16, 2020 (RE: related document(s)7306 Objection to
13 Confirmation of the Plan). Filed by Creditor Committee Official Committee of Tort Claimants,
14 and Exhibits A-D, filed 05/15/2020. [DKT 7331]

15
16 **Documents filed in *In re PG&E Corporation*, United States District Court, Northern District**
17 **of California, No. 3:19-cv-052257-JD:**

18 19. Declaration of David J. Richardson in Support of Response of the Official
19 Committee of Tort Claimants to Debtors Motion Pursuant to 11 U.S.C. §§ 105(A) and 502(C) to
20 Establish Estimated Amount of Fire Victim Claims for All Purposes of the Chapter 11
21 Cases Filed 04/02/2020 ([KT 296]

22 20. Objection re Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 502(c) to
23 Establish Estimated Amount of Fire Victim Claims for All Purposes of the Chapter 11 Cases)
24 filed by Claimant Karen Roberds, et al. (Attachments: # [1](#) Declaration of Francis O. Scarpulla);
25 filed 04/03/2020 [DKT 306]

26 21. Declaration of Eric Lowrey in Support of Objection by Certain Fire Victims to
27 Debtors' Motion Pursuant to 11 U.S.C. 105(A) and 502(C) to Establish Amount of Fire Victim
28 Claims for All Purposes of the Chapter 11 Cases, filed 04/03/2020 [DKT 307]

1 22. Status Conference Statement of Many Fire Victims Re Voting Procedure
2 Irregularities by Individual Fire Victim Creditors. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2,
3 # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, filed 04/27/2020 [DKT 342])

4 23. Objections of William B. Abrams to Debtors' Motion Pursuant to 11 U.S.C. §§
5 105(a) and 502(c) to Establish Estimated Amount of Fire Victim Claims for All Purposes of the
6 Chapter 11 Cases; filed 04/30/2020 [DKT 354]

7 Fire Victim Claimants herein reserve the right to designate additional exhibits.

8 Dated: May 18, 2020

9
10 /s/ Jeremiah F. Hallisey

11 Jeremiah F. Hallisey
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28 Attorneys for GER HOSPITALITY, LLC and
ADOLFO VERONESE FAMILY

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2 **CERTIFICATE OF SERVICE**
3

4 I, Karen J. Chedister, declare as follows:

5 I am over the age of eighteen (18) years and not a party to the within action. My business
6 address is 465 California Street, Suite 405, San Francisco, CA 94104.

7 On May 18, 2020, I served document(s) described as:

8 **NOTICE OF EXHIBITS TO BE PRESENTED AT THE CONFIRMATION HEARING IN**
9 **SUPPORT OF CERTAIN FIRE VICTIM CLAIMANTS' OBJECTION TO PLAN**
10 **SUPPLEMENT IN CONNECTION WITH DEBTORS' AND SHAREHOLDER**
11 **PROPOSERS' JOINT CHAPTER 11 PLAN OF REORGANIZATION DATED MARCH**
12 **16, 2020**

13 on the interested parties in this action as follows:

14 BY E-MAIL/NEF: Service was accomplished through the Notice of Electronic Filing

15 ("NEF") for all parties and counsel who are registered ECF Users and those identified
16 below:

17 I declare under penalty of perjury under the laws of the United States of America that the
18 above is true and correct. This declaration was executed on May 18, 2020 at San Francisco,
19 California.

20 /s/ Karen J. Chedister

21 Karen J. Chedister, Esq.
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